

Lon A. Jenkins (4060)  
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**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF UTAH**

**IN RE:**

**CASE: 25-20119**

Patricia Rosalie Page

**CHAPTER 13**

**Debtor**

**Hon. PEGGY HUNT**

Confirmation Hearing: 3/25/25 10:30 am

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**TRUSTEE'S OBJECTION TO CONFIRMATION AND RECOMMENDATION OF  
DISMISSAL UNDER 1307(c) IF UNABLE TO RESOLVE**

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Lon A. Jenkins, Chapter 13 Trustee, hereby objects to confirmation of the Debtor's plan and in support thereof represents as follows:

1. The Debtor filed a Chapter 13 petition for relief on January 09, 2025 and the First Meeting of Creditors under section 341 was held on February 14, 2025.
2. The Trustee requests that the Debtor provide a statement and evidence regarding the disposition of the \$81,580.77 from the sale of the home listed on the Debtor's Statements of Financial Affairs, Interrogatory No. 18. The Trustee reserves the right to raise any objections under the best-interest-of-creditors test of § 1325(a)(4) once these documents are received.

3. The Trustee requests a breakdown of what living expenses were paid with the \$5,650.00 withdrawn from the Debtor's America First Credit Union financial account in November 2024. The Trustee reserves the right to raise any objections under the best-interest-of-creditors test of § 1325(a)(4) once these documents are received.

4. The Trustee requests an explanation regarding the \$2,500.00 withdrawal from the America First Credit Union financial account on 12/9/2024. The Trustee reserves the right to raise any objections under the best-interest-of-creditors test of § 1325(a)(4) once these documents are received.

WHEREFORE, the Trustee objects to confirmation of the Debtor's plan. If the Debtor is unable to resolve the objection by the confirmation hearing, the Trustee will move to dismiss or convert the case.

Dated: February 25, 2025

MaryAnn Bride  
Attorney for Chapter 13 Trustee

#### **CERTIFICATE OF SERVICE**

A true and correct copy of the foregoing Objection to Confirmation was served on the following parties on February 26, 2025:

Patricia Rosalie Page, 6389 W Lake Ave, South Jordan, UT 84009

ANDREW T. CURTIS, ECF Notification

/s/ Chelsea Anderson